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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

ELIZABETH A. SIMS
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ORIGINAL

June 10, 1997

VIA MESSENGER

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554


Re: Comments of S & S Communications Group, Inc.
MM Docket No. 97-138

Dear Mr. Caton:

Transmitted herewith on behalf of S & S Communications Group, Inc., licensee of Station WNCG-FM, Clyde, Ohio, is its comments in the above-referenced rule making proceeding regarding the Commission's main studio rule and public file requirements.

If you have any questions, please contact the undersigned.

Very truly yours,



Elizabeth A. Sims

Enclosure

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

June 5, 1997

Federal Communications Commission
Washington D.C.

RE: MM Docket No. 97-138

Dear Sirs:

I am writing regarding the Notice of Proposed Rule Making - MM Docket No. 97-138. Here are my opinions that I would like you to consider. Before I start, I would like you to know that our station is a small class A, licensed to a community of 5000.

1. Main Studio Rule - I think your ruling should be based on a specific number of miles from the center of it's city of license for each individual station. I think the number of 30 miles would be sufficient. This ruling would be fair for all communities and stations large or small.

I think 30 miles is a reasonable number, in todays age, 30 miles is "readily accessible". Citizens in my city of license routinely drive 20-30 miles to a county court house, a shopping mall, a hospital, a doctor, etc.... If they would need access to my main studio or public file, I do not think this would be unreasonable. I think a new age is upon us and the rule needs changed to reflect this change. People do not come into the station as the did in the past, they now call, fax, mail, overnight or E-mail us. Furthermore, In the past 10 years I've been in this business, the only person requesting to see our public file has been an FCC inspector.

I am strongly opposed to you drafting a rule specifically for multiple station owners allowing them to locate all of there main studios within one of those stations principle city contours. This would give the large group owners yet another unfair advantage. I understand the benefit to them, but the benefit needs to be given to all broadcasters, not just a select few big publicly financed companies or large group owners.

I feel the Toll-Free telephone access requirement is reasonable.

In closing on this issue, by giving us a broader area to maintain our main studio and public file, I know that my station can better serve the public. We will be able to consolidate offices, hire more staff, save money, provide better programming and give more back to the community we are here to serve. It will also ensure that we always have two employees based at the main studio and that it be open and manned during normal business hours.

2. Local Public Inspection File Rule -

Location - As stated above, I think the Public Inspection File should be kept within it's main studio providing the rule is changed to reflect today's environment.

Content - It is my opinion that you should:

A. Eliminate any requirement to retain the "Public and Broadcasting" manual, which was published in 1974 and is now obsolete, or present a new revised manual.

B. Eliminate the requirement for us to retain documents of a previous owner. In our situation, the information was not available, we tried to get copies from the FCC but we were not successful in all areas. It is not fair that we can be held accountable for this.

C. Eliminate the need to keep transfer and assignment applications in the file. What use are they?

3. Retention periods - It is reasonable to expand the retention of documents in the public file to the length of the full license term. Except, in the case of political time requests, these have no long term value in my opinion and should be kept in the file for only two years, and filed elsewhere after that period of time.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Kent D. Smith", with a long horizontal flourish extending to the right.

Kent D. Smith
President
S & S Communications Group Inc.